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**UNITED STATE DISTRICT COURT**

**DISTRICT OF NEVADA**

EMPLOYERS FIRE INSURANCE  
COMPANY

Plaintiff/ Counter-Defendant,

vs.

BASIC FOOD FLAVORS, INC.

Defendant/Counter-Claimant.

\* \* \*

Case No.: 2:10-cv-001109-JCM-VCF

**STIPULATION (AND PROPOSED ORDER) TO EXTEND  
THE GLOBAL SETTLEMENT DEADLINES**

Plaintiff/Counter-Defendant EMPLOYERS FIRE INSURANCE COMPANY (hereinafter  
“EMPLOYERS”) and Defendant/Counter-Claimant BASIC FOOD FLAVORS, INC. (hereinafter,  
“BFF”), (collectively, the “Parties”), by and through their respective counsel of record submit  
this stipulation to extend the global settlement deadlines, except for the March 27, 2012  
Settlement Conference, as submitted and entered by this Court on January 26, 2012. [Doc.  
No. 65]. The Parties recognize the need to provide ample time for the interested third party  
claimants (hereinafter, “Claimants”) to participate in the discussion of BFF’s settlement  
proposal until such time that a mutual agreement has been reached and an eventual  
resolution of the claims.

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The following dates currently govern this case:

February 3, 2012:	Basic Food Flavors, Inc. submits its final proposal to Buccino and Associates.
February 6, 2012:	Buccino & Associates delivers ballots for approval by voting by Claimants.
February 16, 2012:	Claimants return ballots to Buccino & Associates
February 22, 2012:	Buccino & Associates certifies results of voting to the Court via declaration.
March 27, 2012:	Settlement conference

The Parties propose the following dates:

February 6, 2012:	Basic Food Flavors, Inc. submits its proposal to Buccino and Associates.
February 8, 2012:	Buccino & Associates delivers initial proposal to Claimants for comments
February 15, 2012:	Last day for Claimants to provide comments
February 20, 2012:	Basic Food Flavors, Inc. submits its final proposal to Buccino & Associates
February 22, 2012:	Buccino & Associates delivers proposal to Claimants for approval by voting
February 29, 2012:	Claimants return ballots to Buccino
March 7, 2012:	Buccino & Associates certifies results of voting to the Court via declaration.
March 27, 2012:	Settlement Conference

The Parties therefore request the Court to adopt the newly proposed schedule and maintain the March 27, 2012 Settlement Conference on the Court's calendar.

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1 DATED: February 3, 2012

DATED: February 3, 2012

2 WILSON ELSEER MOSKOWITZ EDELMAN  
3 & DICKER, LLP

LIPSON, NEILSON, COLE, SELTZER &  
GARIN, P.C.

4  
5 By: /s/ Joseph F. Bermudez

6 Joseph F. Bermudez, Esq. (*Pro hac vice*)  
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10 Attorneys for EMPLOYERS FIRE  
11 INSURANCE COMPANY

By: 

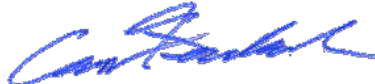
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INC.

12 **ORDER**

11 Pursuant to the above Stipulation,

12 IT IS HEREBY ORDERED that the Stipulation is adopted as the order of this Court.

13 DATED this 6th of February, 2012.



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15  
16 U.S. MAGISTRATE JUDGE

17  
18 Respectfully submitted by:

19 LIPSON NEILSON COLE SELTZER & GARIN, P.C.

20  
21 By: 

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